

Disclaimer:

This document was not produced by DEQ. Some of its content may not be in an accessible format pursuant to Section 508 of the federal Rehabilitation Act of 1973, as amended (29 U.S.C. § 794 (d)). Please call 800-592-5482 if you need assistance.



Air Division 1, rr <airdivision1@deq.virginia.gov>

Deny the Buckingham Compressor Station Permit, Registration No. 21599

1 message

Jimmie Petersen (2jlps@comcast.net) Sent You a Personal Message <automail@knowwho.com>

Fri, Jan 4, 2019 at 9:51

AM

To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Jimmie Petersen 6728 Stream View Ln Warrenton, VA 20187 2jlps@comcast.net (540) 349-1337



Air Division 1, rr <airdivision1@deg.virginia.gov>

Deny the Buckingham Compressor Station Permit, Registration No. 21599

1 message

Antero Aho (9c6dc30c@opayq.com) Sent You a Personal Message <automail@knowwho.com> To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 5:12

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gasfired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous. polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Antero Aho 2652 Hartley St Virginia Bch, VA 23456 9c6dc30c@opayq.com (213) 465-8709



Air Division 1, rr <airdivision1@deg.virginia.gov>

Buckingham Compression Station

1 message

Bryce Abbott <abbottbry@gmail.com> To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 10:50 PM

For the purpose of: Public Comment on Buckingham Compression Station.

To the Virginia Air Pollution Control Board:

I respectfully request Virginia Air Pollution Control Board disapprove the Union Hill site for the Buckingham compressor station because it does not meet site-suitability requirements. A more thorough investigation of the minority community at Union Hill is required before approval is permissible under Va. Code Ann. § 10.1-1307.

The DEQ's estimate of minority residents at Union Hill is much lower than the actual number shown by on the ground research done through door to door interviews, namely over 80% of the 199 permanent residents that live within one mile of the proposed compressor station location. The planned site would negatively affect a predominantly minority community's air quality.

The right decision for the citizens of Virginia, the residents of Buckingham county, and those living in Union Hill is to reconsider the site suitability for the station.

Thank you for your consideration.

Bryce Abbott

501 Nottingham Road, Charlottesville VA 22901

804-310-0440



Angela Kleis (akleis@gmail.com) Sent You a Personal Message automail@knowwho.com To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 9:18 AM

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Angela Kleis 4828 Treasure Ct Fairfax, VA 22032 akleis@gmail.com (703) 963-6771



Air Division 1, rr <airdivision1@deg.virginia.gov>

Deny the Buckingham Compressor Station Permit, Registration No. 21599

1 message

Alison Lynch (alisonlyn@gmail.com) Sent You a Personal Message <automail@knowwho.com> To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 5:37

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gasfired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous. polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Alison Lynch 151 Breezy Point Dr Yorktown, VA 23692 alisonlyn@gmail.com (757) 912-2373



Allen Witherington (allenwitherington@yahoo.com) Sent You a Personal Message <automail@knowwho.com>

Fri, Jan 4, 2019 at 8:49

To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Allen Witherington 131 Jefferson Dr Palmyra, VA 22963 allenwitherington@yahoo.com (434) 589-8986



Air Division 1, rr <airdivision1@deq.virginia.gov>

union hill buckingham compressor station public comment

1 message

Ann Mallek <amallek@albemarle.org>

Fri, Jan 4, 2019 at 11:44 PM

To: "airdivision1@deq.virginia.gov" <airdivision1@deq.virginia.gov> Cc: Ann Mallek <amallek@albemarle.org>



Rio

COUNTY OF ALBEMARLE Norman Dill Diantha H. McKeel Office of Board of Supervisors Rivanna Jack Jouett 401 McIntire Road Charlottesville, Virginia 22902-4596 Liz A. Palmer Richard Randolph (434) 296-5843 FAX (434) 296-5800 Scottsville Samuel Miller Ann H. Mallek Ned Gallaway

January 4, 2019

Dear Members of the Air Pollution Control Board:

White Hall

I urge you to deny any permits for location of the ACP transmission unit in Union Hill, VA.

The unfairness of this location is staggering. The Union Hill community, which is about 85% African American, was established by freed slaves after the Civil War. The proposed site for the compressor station is located near two African American Churches and near slave cemeteries and slave burial grounds, which often are unmarked.

The compressor station would emit cancer-causing pollutants into the air at Union Hill, exposing these residents to high concentrations of exposure, the health consequences for which the ACP company will take no responsibility in the future, as the health issues such as cancer come to light.

Dominion selected Union Hill for the location of this dangerous and environmentally hazardous compressor station instead of nearby communities that are more affluent and more Caucasian. Dominion thought these poor, black residents would not be able to fight back. Yet Union Hill residents have found friends and supporters all over the nation.

The environmental justice issue is huge. African American children are 6 times more likely than white children to have asthma. This plant is larger than any other compression station and the true effects of this "beta" model station are not even known and information about them has not been provided to the community. Putting toxic fossil fuel infrastructure through underserved minority communities makes the injustice even worse.

Fractraker analysis found that, on average, a pipeline catches fire every 4 days and results in an explosion every 11 days, an injury every 5 days, and a fatality every 26 days. They concluded that hazardous liquids pipelines cause the majority of incidents (64%) and damages (also 64%) even though the liquids account for less than 8% of the total mileage of the network. Natural gas distribution lines account for most injuries (79%), deaths (73%), evacuees (62%), fires (71%), and explosions (78%).

Newer pipelines less than 10 years old have more incidents than any other age group. According to FracTracker, "the older the pipeline, the fewer the number of incidents." The causes of these tragedies include equipment failure, operator error, and corrosion.

Yet these kinds of consequences are being proposed upon people who cannot get away. Those whose property is next to the station will not be able to sell due to the station yet they cannot stay and survive. Many people live in the incineration zone and have no future, no hope to leave and are desperate.

They only have you to stand in the way of big utility and big government; you must be the voice for people who have none. As I told the Governor last year, when you find an issue on which environmentalists and property rights advocates agree, you must realize that it is unlikely the issue you are pressing is going to succeed. These groups collectively will never give up; the losses they face are

Thank you for your service to the citizens of the Commonwealth. Sincerely, Ann Huckle Mallek P O Box 207 Earlysville VA 22936 434-978-1150

2 attachments



image003.png



Air Division 1, rr <airdivision1@deq.virginia.gov>

Deny the Buckingham Compressor Station Permit, Registration No. 21599

1 message

Andrea Mccurry (andreasusanmc@gmail.com) Sent You a Personal Message <automail@knowwho.com>

Fri, Jan 4, 2019 at 10:17

A۱

To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Andrea Mccurry 631 Taylors Gap Rd Charlottesville, VA 22903 andreasusanmc@gmail.com (434) 974-6644



Angela Vogel (angievogel99@hotmail.com) Sent You a Personal Message <automail@knowwho.com> Fri, Jan 4, 2019 at 12:17 PM To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Angela Vogel 4349 Chesapeake Place King George, VA 22485 angievogel99@hotmail.com (540) 663-0219



ACP Compressor Station, Buckingham county : Comments on Union Hill Community Household Study

anne buteau <annebuteau@yahoo.com>

Fri, Jan 4, 2019 at 12:02 AM

To: "airdivision1@deq.virginia.gov" <airdivision1@deq.virginia.gov>

I am writing in support of the Union Hill Community Household Study. We live 6 1/2 miles from the James River on the Nelson County side, and our house is in the evacuation zone, barely out of the "blast zone" of the ACP. On the original route, the pipeline would have been buried 200 feet from our back door, and we were devastated, as our land is not yet paid for but is all we have, and we were basing our future security on it's value. I cannot imagine having the devastation of the ACP close to your house PLUS the pollution from a compressor station that would poison yours and your childrens health.

I feel so sorry for the Union Hill Community for what they are going through. This stress sends you into a kind of depression, with anger, frustration at the lies of Dominion, and a feeling of helplessness, all of which you have to overcome to find the energy to oppose this land and life stealing uneccessary monstrosity called the ACP.

The study clearly shows that Dominion for whatever reason, chose the site that had the most impact on a neighborhood. Why? Is it because black lives don't matter to them? Historically African American people have been abused in many ways by white people, and had to "put up with" hardships and so maybe Dominion thought it would be easier to impact a bunch of older black people.

This study shows the true status of the people in Union Hill, and their pre existing health issues. There is no way this compressor station should be built there.

Please do not allow it to pollute the clean air of Union Hill.

thank you, Anne Buteau Nelson County, VA



Arden Green (ardenj13@yahoo.com) Sent You a Personal Message <automail@knowwho.com>To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 9:13 AM

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Arden Green 10633 Cliffmore Dr Glen Allen, VA 23060 ardenj13@yahoo.com (804) 274-0274



Mary Armstrong (armstrong10306@hotmail.com) Sent You a Personal Message <automail@knowwho.com>

Fri, Jan 4, 2019 at 9:00 AM

To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

Please do not continue this environmental injustice in Virginia. Thank you.

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Mary Armstrong 7916 Featherchase Ter Chesterfield, VA 23832 armstrong10306@hotmail.com (804) 393-4430



Air Division 1, rr <airdivision1@deg.virginia.gov>

Deny the Buckingham Compressor Station Permit, Registration No. 21599

1 message

Abigail Russo (arusso144@gmail.com) Sent You a Personal Message <automail@knowwho.com>

Fri, Jan 4, 2019 at 3:09

To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

Permitting the Buckingham Compressor Station would be an absolutely outrageous miscarriage of justice. Not only would it hurt the health and life of the people in the community, the compressor station would also hurt the environment in part of the Virginia Community.

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response. DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gasfired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Abigail Russo

8706 Standish Ln Henrico, VA 23229 arusso144@gmail.com (732) 320-8682



Air Division 1, rr <airdivision1@deg.virginia.gov>

Deny the Buckingham Compressor Station Permit, Registration No. 21599

1 message

Mary Barhydt (barhydt@cox.net) Sent You a Personal Message <automail@knowwho.com> Fri, Jan 4, 2019 at 5:30 PM To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gasfired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Mary Barhydt 5555 Lakewood Dr Norfolk, VA 23509 barhydt@cox.net (757) 855-1440



Air Division 1, rr <airdivision1@deq.virginia.gov>

Public Comments Regarding Air Permit

1 message

Basil I. Gooden, Ph.D. <basil@vt.edu> To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 11:54 PM

2 attachments



Letter from Joe Scruggs .pdf 466K

Adrian M. Jones 2266 Union Hill Road Buckingham, VA 23921

January 3, 2019

Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office 4949-A Cox Road Glen Allen, VA 23060

Re: Buckingham Compressor Station

To Whom It May Concern:

I am a very proud lifelong resident of Buckingham County. My house and property are about one mile away from the proposed place for the compressor station. Buckingham is a place where we care about and help out our neighbors. For us, it doesn't matter whether they are rich or poor, black or white—we are a community of family and neighbors. For some reason, there is a push to claim that the proposed compressor station will be located in a black community. I'm not sure how and why race is a factor, because aren't we all human beings?

There may be differences in opinion about whole pipeline issue, but our ties to each other are deep and strong. We were neighbors before Dominion came into the picture and we will remain neighbors regardless of what happens. I am concerned about all of my neighbors and I don't care what color their skin is. It's actually sad that I have to state this in a letter that I am writing in 2019!

Sincerely

Adrian M. Jones

Joseph Scruggs 23108 N James Madison Hwy Dillwyn, VA 23936

Virginia Department of Environmental Quality (DEQ) Piedmont Regional Office 4949-A Cox Road Glen Allen, VA 23060

Dear DEQ:

My name is Joseph Scruggs and I am a resident of Buckingham County. While I do not live within the Union Hill community, I feel that as a retired educator, and former member of the Board of Supervisors, I have a great knowledge of the makeup of the communities within the county. Much has been said that the Union Hill community is historic, and a majority of the residents are African American. Based on my knowledge of the county and the last census this is a misleading view of the community. This community is not composed to a majority of African Americans, and it is no more historic in than any other area of the county. As a matter of fact there are other areas in the county, such as the Third Liberty community, that was the birth site of Dr. Carter G. Woodson, that holds a greater historic value to the African American community then Union Hill.

I am in full support of the compressor station and do not see it as dividing or destroying an African American community. The air of division comes not from the community, but from those outside the community, who up until this time have shown little of no interest in this community. Their efforts in bringing about confusion and putting out misleading information is totally self-serving. This is a diverse community, but it includes more Whites then African Americans who live close to the proposed compressor site.

With that being said, as an African American resident of the county, I do not see the location of the compressor station as an undue burden on the African American community.

Joseph Scruggs 434-983-3849 joescruggs53@centurylink.net



Barbara Cruickshank (bcruickshank4@gmail.com) Sent You a Personal Message <automail@knowwho.com>

Fri, Jan 4, 2019 at 8:19

To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Barbara Cruickshank 700 Spring Lake Dr Earlysville, VA 22936 bcruickshank4@gmail.com (434) 973-0373



cindy jackson (beechknollamas@yahoo.com) Sent You a Personal Message <automail@knowwho.com> Fri, Jan 4, 2019 at 9:13 AM To: airdivision1@deg.virginia.gov

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

cindy jackson 720 Radford Ln Charlottesville, VA 22903 beechknollamas@yahoo.com (434) 823-6419



Betty Ware (bettybware@verizon.net) Sent You a Personal Message <automail@knowwho.com>To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 8:33 AM

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Betty Ware 2 Paxton Rd Richmond, VA 23226 bettybware@verizon.net (804) 282-7156



Air Division 1, rr <airdivision1@deq.virginia.gov>

Deny the Buckingham Compressor Station Permit, Registration No. 21599

1 message

Jan Wiley (birdsongs@hotmail.com) Sent You a Personal Message <automail@knowwho.com>
To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 10:25

AM

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gasfired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Jan Wiley 532 Red Bud Ln Woolwine, VA 24185 birdsongs@hotmail.com (276) 930-3869



Air Division 1, rr <airdivision1@deg.virginia.gov>

Deny the Buckingham Compressor Station Permit, Registration No. 21599

1 message

Janet Gooch (blueleopoard@gmail.com) Sent You a Personal Message <automail@knowwho.com>

Fri, Jan 4, 2019 at 6:14

To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gasfired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous. polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Janet Gooch 600 Church St Norfolk, VA 23501 blueleopoard@gmail.com (757) 201-4466



Blythe Merritt (blytheem@gmail.com) Sent You a Personal Message <automail@knowwho.com>To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 12:26 PM

Dear Virginia Air Pollution Control Board,

Virginians are counting on the Air Pollution Control Board to protect our air!

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Blythe Merritt 7401 Wayfarer Dr Fairfax Station, VA 22039 blytheem@gmail.com (703) 850-5221



Bonnie Farmer (bnb93@mac.com) Sent You a Personal Message <automail@knowwho.com>To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 12:08 PM

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Bonnie Farmer 5913 Ambassador Way Alexandria, VA 22310 bnb93@mac.com (999) 999-9999



Air Division 1, rr <airdivision1@deg.virginia.gov>

Buckingham Compressor Station Comment 1-4-19

1 message

Bolgiano, Christina E - bolgiace <bolgiace@jmu.edu> To: "airdivision1@deq.virginia.gov" <airdivision1@deq.virginia.gov> Fri, Jan 4, 2019 at 10:01 AM

I am writing to urge the Air Control Board to review and accept the corrected demographic data on the Union Hill community compiled since its last meeting. Data used previously by DEQ and Dominion were based on generalized and preliminary methods, such as census blocks, that merely estimate numbers on a first draft basis without ground-truthing. Although use of these tools was never meant to provide the foundation for decision making, the inaccurate numbers they provided allowed DEQ and Dominion to claim that locating a highly polluting compressor station in Union Hill would not deleteriously affect that community. Ground-truthing in the form of a professional anthropologist who went door to door, following standards set by NIH, found much greater population density and a much higher percentage of non-white residents within a one-mile radius of the planned compressor station. Aside from the fact that the ACP is unnecessary. dangerous, destructive, counter-indicated by climate science and a consumer boondoggle aimed only at enriching Dominion even further, the blatant environmental racism shown by DEQ and Dominion by its use of lousy, inaccurate demographic data must be refuted, and the permit for the compressor denied.

My name, address, and phone # are below. Thank you for the opportunity to comment.

Chris Bolgiano, Professor Emerita, James Madison University 10375 Genoa Road, Fulks Run, VA 22830 540-896-4407



Air Division 1, rr <airdivision1@deq.virginia.gov>

Permit for the proposed Buckingham Compressor Station

1 message

bowbro@juno.com <bowbro@juno.com> To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 6:07 PM

To the State Air Pollution Control Board,

I urge you to deny the air quality permit for the proposed Buckingham Compressor Station for the following reasons pertaining to site suitability and population:

- 1. The DEQ did not do a proper site suitability analysis, which is a violation of state law and requires rejection of the draft permit. This is explained in the December 7, 2018 letter from the Southern Environmental Law Center.
- 2. The ACP Buckingham Compressor Station Environmental Justice Review, dated November 28, 2018, uses invalid census data to characterize the affected population. Dependence on that analysis would be unethical. The only valid assessment of environmental justice factors in the legal record is the Union Hill Community Household Study Site and Methods Report. The Board must respect this information.

Thank you for your service to the Commonwealth. Mary Jo Bowman Mount Solon, VA (Augusta County)



Deny the Buckingham Compressor Station Permit, Registration No. 21599

Barbara Atkinson (bsra2@earthlink.net) Sent You a Personal Message <automail@knowwho.com>To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 5:23 AM

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Barbara Atkinson 871 Farmview Rd Crockett, VA 24323 bsra2@earthlink.net (276) 686-4547

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.



Against the Proposed Buckingham Compressor

1 message

Elizabeth Tabony btabony@gmail.com To: airdivision1@deg.virginia.gov Cc: Betty Tabony btabony@gmail.com

Fri, Jan 4, 2019 at 11:13 PM

Dear Virginia Department of Environmental Quality:

I want to express my strong opinion that the Air Pollution Control Board should not grant the permit for the Buckingham Compressor Station to be built.

The letter from the Southern Environmental Law Center explains that the numbers used by the Air Pollution Control Board are just estimates of the populations living at and near the site of the proposed compressor station.

The actual numbers show that there is a much higher percentage of African American people living in the area.

The actual count of the population is not a difficult thing to do. The information is already available. It is the duty of the Air Pollution Control Board to use the correct numbers.

I respectfully request that the Air Pollution Control Board deny the permit for the Buckingham Compressor Station.

Sincerely,

Elizabeth H. Tabony 920 Henry Ave. Charlottesville, VA 22903



No to Buckingham Compressor Station

1 message

Dave Pruett <c.david.pruett@gmail.com> To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 9:19 PM

Dear DEQ.

How do I oppose the Atlantic Coast Pipeline? Let me count the ways. It's unnecessary. It's destructive. It's dangerous. It's unfair: public pain for private gain.

But most relevant for the moment: it's proposed Buckingham Compressor Station is a prime example of environmental racism, because it will environmentally devastate a historic African-American community.

Please consider the following:

First, the DEQ did not do a proper site suitability analysis, as explained in the <u>letter from</u> the Southern Environmental Law Center (SELC) dated December 7, 2018. This failure violates state law and requires rejection of the draft permit.

Second, the ACP Buckingham Compressor Station Environmental Justice Review, dated November 28, 2018, uses invalid census data to characterize the affected population and dependence on that analysis would be arbitrary and capricious.

Third, The only valid assessment of environmental justice factors in the legal record is the Union Hill Community Household Study Site and Methods Report. If the Board fails to properly respect this information, its action will be invalid.

Please do the right thing. Vote NO for the Buckingham Compressor Station.

Respectfully yours,

Charles D ("Dave") Pruett

28 Edgelawn Drive

Harrisonburg, VA 22801

540-246-3087

C. David ("Dave") Pruett Professor Emeritus Department of Mathematics & Statistics James Madison University 540-246-3087 (Home)

Author of *Reason and Wonder* (Praeger, 2012) http://reasonandwonder.org and/or http://www.amazon.com/author/woksape



Please Deny Air Permit for Buckingham Compressor Station

1 message

Carol Snell-Feikema <carol.snell-feikema@emu.edu> To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 4:04 PM

Esteemed Air Pollution Control Board Members,

The land for the ACP Compressor Station at Union Hill, VA was originally a slave plantation. Descendants of the plantation owners sold it to Dominion Energy, reaping big profits, while the effects of the compressor station will be suffered by the 85% African American community, many descendants of the very people enslaved on or near the plantation land sold for the site. It sounds brutally clear that racism continues in Virginia.

Why are dangerous facilities that affect the health and well-being of surrounding communities so often located on Indian reservations or in African-American, Latino or other poor, disadvantaged communities? Does Environmental Racism really exist and why?

These questions must be addressed with absolute honesty and integrity. Why not build renewable energy, provide longterm employment and save the planet instead of considering people and the earth as disposable commodities for massive corporate gain? God hears the cry of the poor. God hears the cry of the earth. Please listen to this cry, and deny the permit for the Buckingham Air Compressor station for the Atlantic Coast Pipeline. Sincerely,

Carol Snell-Feikema 1174 Westmoreland Drive Harrisonburg, VA 22801 carol.snell-feikema@emu.edu 540-830-1431



Air permit under consideration

1 message

Carol <carolmorency@hotmail.com>

Fri, Jan 4, 2019 at 5:04 PM

To: "airdivision1@deq.virginia.gov" <airdivision1@deq.virginia.gov>

Dear VAPCB Board Members,

I am a resident of Staunton, Virginia and I am opposed to the air permit under consideration for the compressor station proposed in Buckingham Co.

This location has two sensitive populations, the Historic Union Hill community and the spiritual center nearby, Yogaville. The DEQ did not do a proper suitability analysis. This failure violates state law and requires rejection of the draft permit.

The ACP Buckingham Compressor Station Environmental Justice Review, dated Nov. 28, 2018, uses invalid census data to characterize the affected population and dependence on that analysis would be arbitrary and capricious.

This is not proper protocol and is not acceptable to the residents of Virginia. Please vote NO for this air permit. Sincerely, Carol Morency (540)294-2148

Mailing address P.O.Box 598, Staunton, Virginia 24402

Sent from my iPad



Comment on Buckingham Compressor station permit

1 message

Carrie Pruett < carriempruett@gmail.com> To: airdivision1@deg.virginia.gov Cc: deapublicinfo@deq.virginia.gov

Fri, Jan 4, 2019 at 4:21 PM

I have followed the process regarding the approval of the Buckingham Compressor station Air Permit since 2017, and I attended the meeting that was held in Buckingham County last fall.

I appreciate the diligence that the Board members have shown in providing documents for public review.

After reviewing the documents. I unfortunately do not believe that DEQ has done its duty in a similarly responsible manner. The census data that DEQ staff reported does not meet best practices for environmental justice analysis under the National Environmental Policy Act. DEQ's own staffer, Patrick Corbett, has referred to the data as 'screening' information that he would not choose to rely on.

Yet DEQ appears to have made no effort to obtain more reliable data -- apparently counting on muscling their proposals through the Air Board, as they have been able to in the past. This contempt for the citizen boards, shown both by DEQ and through the governor's staffing decisions, is itself cause for concern.

More to the point is that better information is available, as convincingly demonstrated in Dr. Fjord's Community Household Study.

The information in this study supports comments made by members of the community as well as the recommendations of the Governor's own Environmental Justice Commission.

Please take this opportunity to deny a permit that will harm a vulnerable community.

-Caroline Pruett 804-305-2226 4908 Finnegan Court Henrico, Virginia 23228



Deny the Buckingham Compressor Station Permit, Registration No. 21599

Catherine Saunders (cathy.saunders@gmail.com) Sent You a Personal Message <automail@knowwho.com>

Fri, Jan 4, 2019 at 12:28

PM

To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

As a scholar of African-American history and culture, and as a person of faith mindful of America's history of white supremacy, I am especially concerned about the possibility that the proposed station will disturb the health, peace, and wellbeing of an historically African American community formed by former slaves. This plan needs careful additional study.

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Catherine Saunders 1021 Arlington Blvd, APT 323 Arlington, VA 22209 cathy.saunders@gmail.com (703) 527-0434

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.



BUCKINGHAM COMMUNITY RESIDENT

cburnley cburnley@kinex.net To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 12:30 PM

My name is Christine Burnley. My husband and I live at 210 Shelton Store Road, in Buckingham, Virginia. My property is approximately 550 yds away from the proposed compressor station site. My husband has lived in this community his whole life(53 years) and I have lived in the community for 36 years. Contrary to the information presented in the media, the people in our community are not divided and we get along well together and care about each other. I want people to know the truth about our community. Our community is diverse and includes African-Americans, but there are more Whites that will live closest to the compressor station which includes our family. My mother in law, aunts, uncles, cousins, my two sons, their wives and my precious grandbabies. Both of my sons houses are the closest residence to the proposal Compressor station. Which is around 250yds from their actual home but closer to property line. All the media surrounding this has been unreal and also the majority of it has been untrue. I don't understand why it makes so much of a difference what race lives closer to it because we are all human beings. If it's safe for one it should be safe for all regardless of your race. My husband and I are asking you to make your decision on this permit for the proposed compressor station on the facts of air quality not race. My family and friends are very important to me and I want the air we breath to be safe. Because at the end of the day the air we breathe is the most important issue and it is what the majority in this community wants. No political or media drama because after it's all done the politician and the media will be gone to another topic but we will still be here with or without a compressor station. May God help guide you in your decision process that is based on truth and may he also bless each and everyone of you and your families.

Thank you for your time. Ricky and Christine Burnley

Sent from my Samsung Galaxy smartphone.



Public Comments for Air Board Meeting Jan 8

Carrie Girstantas < cgirstantas@gmail.com > To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 8:25 AM

or an arrioron regularing margor

To: DEQ Air Board Committee- Union Hill Compression Station for (ACP) Atlantic Coast Pipeline

From: Carrie E. Girstantas

1111 Sherwood Road,

Charlottesville, VA 22903

434.466.3557

cgirstantas@gmail.com

Date: January 2, 2019

Re: Public Comments in Opposition to approve Compression Station at Union Hill for ACP

Thank you for the opportunity to provide public comment on the Compression Station at Union Hill for the Atlantic Coast Pipeline. I understand that the DEQ-Air Board has a specific mandate to ensure the public health and safety of the air quality with regards to this project. I am stakeholder in several ways, Buckingham County has many outdoor activities that I use including the James River for swimming, tubing, and kayaking, retreats at Yogaville and snowboarding at Wintergreen, as well as the location of an outdoor school, Discovery School that my son attended. Furthermore given the historic and cultural value of the Union Hill community, it appears that Dominion used a tacit of environmental racism to place a particularly intrusive and toxic feature of the ACP in a location that was vulnerable due to economic and institutional racism. I am concerned for the short and long term health impacts of such a polluting source near such a critical community as well as a county whose economic well-being relies on a safe, non-toxic, rural, natural environment.

I would note that this is not my first public comment and that I personally attended the board meetings in Buckingham County during 2017 and 2018 when the various matters where in discussion regarding this Compression Station were before it. I am trained as a system engineer and have training to understand and develop projects in accordance with existing laws and protections for various infrastructure development project, and have worked professionally in Land Use engineering and Clean Air Act regulation in the state of Virginia. Firstly, the needs and benefits have not been adequately demonstrated for the approval of the this natural gas pipeline. I have several specific reasons that I OPPOSE the approval of the Atlantic Coast Pipeline, furthermore the methods and tactics employed by Dominion Power to misuse the public natural resources of Virginia and in particular Buckingham County for corporate profit-making gain needs to be interrupted. The entire permitting process is fragmented and there has not been due diligence to ensure the citizens of Buckingham County and Virginia at large will be addressed during the construction and operation of this unneeded pipeline. I would like to be included in all notifications on this project and be invited to open meetings and events related to this project.

While these do not represent all my critiques, knowledge or experience these are some of the most pressing with regards to the concerns with the Compression Station proposed by Dominion Power for the ACP.

- 1) Compressor Station in Buckingham County is a specific and blatant instance of environmental racism. The County Supervisors are currently being sued for their inappropriate approval of this project to their stated long term planning programs. Furthermore, Dominion Power has inappropriately filed for public use permits when the pipeline is set up at a for-profit corporate entity. This is an example of a corporation, namely Dominion Power, taking the resources of individuals within one of the poorest communities in Virginia. Environmental racism is well documented in planning and development of this project targeting and ultimately selecting a vulnerable predominately African American church community to bear the brunt of the environmental hardship. The level of risk is unacceptable for the citizens in this region for the purpose of corporate gain.
- 2) Public Health and Safety of the community is unnecessarily compromised by the size of the Compressor Station proposed in Buckingham County. This proposed compressor station is out of compliance with any known studied, and much smaller compressor stations have been known to should pose serious risks to the businesses of tourism, therapeutic schools, and agriculture. All this business stands to be shut down when this compression station is operating due to the health impacts. Furthermore, oversight for Dominion Power has not been adequately proposed of accounted for. The size of the compressor station has not been studied or demonstrated in need for the appropriate production levels for the needs of the state.
- 3) The communities have been misled regarding the number and type of jobs created by the pipeline. Public statements by Dominion Power have been misleading and inaccurate for community decision making. There is no accountability on Dominion Power to truly provide for or secure these jobs, whereas the definite and real loss of property value to individual property owners, as well as the loss of other tourism and agricultural business is irreparably lost. What has been legally ensured is Dominion Power's profit margin which is indicates their true motive for this project. The real economic trade-offs have not been adequately considered and addressed. Given I attended these meetings, the manner in which the Buckingham Board of Supervisors were misled by Dominion was obvious and alarming. The trade-off of health and sustainable economic development based on a rural healthy environment for a meager pay-off that only benefits a few is disturbing and will continue to be addressed. This action taken by the Buckingham county officials was against the very Land Use documents created by Buckingham County, and they made it because they said Dominion stated that the DEQ would review the impacts appropriately.
- 4) while different in scope it goes without mentioning that climate change and the pollution generated by the rampant use of fossil fuels is well established in science and must be acknowledge by this DEQ Board that is responsible to ensure that best environmental guideline sna science be employed. International and national efforts to reduce emissions and greenhouse gases are important and must be considered. As part of this proposal process these concerns must be addressed in the face of compelling scientific evidence. Current resources should be to improve the current infrastructure rather than decimate pristine resources for short term unestablished gains for a specific corporations. Alternate technology and means for obtain energy production were not considered as well as the scope of this project within the greater context is also absent.
- 5)I would point out that needs and benefits have been established for the region or for the not justified by Dominion Power. The risks of this construction are not offset in any way by meeting a needs for the community, the county, the state, or even the nation. This is the most foundational issue with the Atlantic Coast Pipeline. The nation has plenty of pipelines and this cost and risks associated with this proposal are NOT warranted by any compelling evidence for need

or benefit to the individuals, communities, or nation. Furthermore, trends and economic gain by alternative energy production are possible. The Eminent Domain law inappropriately employed for this project and sets precinct for further erosion of individual property rights and financial security at the whim of corporate gain and greed. Again, there has not been a documents NEED for this level of fossil fuel production in this region. The individuals of Union Hill do not need to bear the unnecessary burden of loss of health and economic stability in loss of home values.

I am trained as a system engineer and have training to understand and develop projects in accordance with existing laws and protections for various infrastructure development project. I have participated in this process a citizen and I have felt legitimate health and safety concerns are not being heard and people within positions of responsibility have been abdicated their duties and responsibilities. I have worked as an engineer in central Virginia and have been generally shocked by the "good-'ol boys" network in general, however to witness it at such a magnitude with such a well organized and thoughtful group of citizens in the face of politics and corporations to side step necessary environmental and social values is disturbing. In this case Dominion Power is unduly putting an entire lower income, dominantly African-American community at risk financially and with regards to its health. Along with a county who have clearly expressed a value of economic development based on health toxic-free environment, with individuals that have build their inheritance in the land and environment only to irreparably damaged without compensation. I specifically OPPOSE the placement of the compression station for it size and location at Union HIII for the Atlantic Coast Pipeline. I hope the integrity, stewardship, and professionalism of each board member to act on behalf of myself and the other citizens who are dependant on your clear sighted judgement to not be corroded by corporate and political ambitions.

Carrie E. Girstantas, ME 1111 Sherwood Road Charlottesville, VA 22903 cgirstantas@gmail.com 434.466.3557

Carrie Girstantas 434.466.3557



Public comments for Air Pollution Air Board

1 message

Charlene Oba <chado108@icloud.com>

Fri, Jan 4, 2019 at 11:41 PM

To: airdivision1@deq.virginia.gov, ignacia@imorenogroup.com, Richard Langford <richard@langfordmail.net>, Trip Ferguson <tripferguson@harveylindsay.com>, Nikki Rovner <NMRovner@gmail.com>, citizenboards@deq.virginia.gov

Please find attached my comments for Buckingham Compressor Station review. Thank you.

Chad Oba 571 Woods Rd\ Buckingham, va 23921 c 434 806 6332

Comments for 1:4:19 to Air Board.pdf 99K

January 4, 2019

Via email to:

Virginia Air Pollution Control Board Members of the Air Pollution Control Board

RE: Virginia Air Pollution Control Board's review of new information and additional public written comment period for Buckingham compressor station (No 21599)

I submit the following as a response to the new information and permit conditions that were submitted to the board on 11/8/18 and on 12/19/18.

Misrepresentation of Community Engagement by Dominion ACP

Lack of response to community concerns by DEQ

Comments on Dr Fjord's Community Participatory Study as a team leader

Dear Air Pollution Control Board Members:

Thank you for serving on the Air Pollution Control Board. I would like to remind you that this board exists to create a much needed separation from a governmental agency that unfortunately is being corrupted by a powerful industry that buys it's way to what it wants. It has even attempted to buy it's way into the quiet rural community of Union Hill/ Woods Corner where my husband and I have lived for the past 35 years. Dominion ACP has plied us with promises of things that we would never need in the first place if they were not wanting to site their huge 54,000 plus compressor station in our neighborhood. Mitigating the harms with a 5.1 million dollar community package does not reduce the harms we would suffer in this community. We trust and fully expect that this very important trust that the public has in you will be upheld with the upmost ethical attention. The quality of our lives, specifically the air we breath, depends on it.

This board represents a moral compass and the voice of the people. You do not represent DEQ or the Governor or Dominion. The board existed beginning in 1966 long before the DEQ as an agency came along in 1993. State of Va code 1-1307 (E) provides the following mandates that you are probably well aware of, but I am compelled to remind you.

- 1) Harm to safety, health and property
- 2) Social and economic value
- 3) Suitability of the activity to the area in which it is located
- 4) Scientific and economic practicality

This provides the legal framework for the Air Board to reject a permit based on the determination of non suitability of an activity in a location, even if it is otherwise in compliance.

Background:

Friends of Buckingham was organized in the late summer of 2014 after community members were made aware of Dominion ACP's plans to locate approximately 25 miles of pipeline in Buckingham and to additionally locate the only compressor station for the state of Virginia at a then undetermined location in central Buckingham. Many residents expressed their concern and we felt it was incumbent to organize and educate ourselves about what this might mean for our safety, our health and our local and regional resources. We soon after advertised a public meeting and held one of many open public meetings to educate and invite experts in their fields to provide us with much needed information on pipelines and in particular compressor stations. Close to 200 open meetings and events were held over four and half years in Buckingham. Soon after learning that the compressor station was to be located in the Union Hill, Shelton Store Rd, James River Highway and Woods Rd area of the county we continued to hold open meetings at the Union Hill Baptist Church. These meetings were attended by members of the Union Hill community, the nearby community of Yogaville and other residents of Buckingham and Virginia.

Our mission as Friends of Buckingham is to preserve the natural resources and cultural heritage of Buckingham County and to encourage sustainable economic development.

Goals and Objectives

- Listen to and address as appropriate the concerns of the residents, especially those who would be impacted by the location of the Buckingham compressor station.
- Encourage and discuss the needs of the Union Hill and surrounding community.
- Provide education through guest experts and other informational venues
- Empower and assist members to participate in the public process and voice concerns before regulatory agencies

- Focus on acivities that improve the health, safety and economic well being of residents
 - e.g. Base line testing of well water, air and Buckingham water ways (See Heidi Dhivya Berthoud's comments to Air Board on 9/21/18)

Misrepresentation of Community Engagement by Dominon ACP

Dominion ACP in the Fall of 2015 announced that they were going to have a Community Advisory Group (CAG). https://www.farmvilleherald.com/2015/09/dominion-forms-community-advisory-group/ Marie Gillespie of the Union Hill neighborhood, Pastor Paul Wilson and myself expressed that we wanted to be part of the group as did some community members from Yogaville during a meeting at the Buckingham Administration building. We were not invited to participate, in fact there was not anyone from the Union Hill neighborhhood that was invited. Kenda Hanuman, the co chair of Friends of Buckingham at that time, interceded with Carla Picard, a representative of Dominion, and the invitation was then extended. It was unfortunately too late for Marie Gillespie. The venue was extremely small and the event was not well advertised so although it is stated in the summary of Dominion's Community Engagement report (CER) that it was open to the public, very few people attended other then the invitees, not one of whom was a resident of the impacted neighborhood.

There were two other CAG meetings after that (as reported in the CER). Citizen participants form Union Hill and Yogaville, the impacted areas of the county, tried to have their concerns for safety, health, property values, cultural resources and economic concerns addressed, but were continually ignored and redirected to such things as lighting of the compressor station, landscaping and color and design and fencing. Our real concerns were never addressed. (See Joseph Jeeva Abbate comments 1/4/19) The three meetings took place in September 2015, December 2015 and January 2016.

There were no meetings in Union Hill with residents until May 2018, nearly two and a half years later when a small group of people met with Basil Gooden to discuss our concerns. A few meetings were listed on the CER that were only one on one meetings such as the one with Kenda Hanuman that is reported in the CER as 3 hours. Kenda Hanuman reports that it lasted one hour and she was not representing the Yogaville community as reported in the CER. She asked for the meeting with Union Hill members and some Yogaville representatives that later took place on May 16th. Once again we were placated and our concerns for an evacuation, safety plan and health concerns were not addressed. We were informed, redirected to the Dominion agenda and never

listened to (see Mary Finley Brook's comments 1/4/19 on Ladders of Citizen Participation).

In the Spring of 2018 the Governor's Advisory Council on Environmental Justice became interested in the possible environmental injustice in Union Hill, which was brought to their attention by our group Friends of Buckingham and other groups who had been attending some of our meetings and events. They investigated, visited on several occasions and listened to concerns from residents. They subsequently made recommendations to the Governor that identified the placement of the compressor station in the Union Hill neighborhood as an environmental justice issue and called for a halt to the pipeline (see Mary Finley- Brooks comments on 1/4/19). It was only after the attention of the ACEJ and their recommendations that this was an environmental justice issue and public attention was directed towards this, did Dominion start to have their first meetings that supposedly would address community concerns. However the first of these meetings was held in Dillwyn with a majority of people who were not from the Union Hill nieghborhood. Ruby and John Laury of the neighborhood were invited at the last minute at the request of Pastor Paul Wilson. They reported later that they did not feel their concerns were heard and that it was an attempt to promote the compressor station and was in nature one directional. (See Ruby Laury's comments 1/3/19).

Other small meetings took place with individual family groups. They were reported as only promoting what Dominion wanted and that their real concerns were not addressed in any kind of meaningful way. (see Shelly Harper comments on 1/3/19)

On August 15th a meeting took place wherein Basil Gooden had encouraged Kathy Mosley, chair of Concern for the New Generation, a community based Union Hill group to organize. Only a select number of residents from the community were invited. Kathy later stated that she felt manipulated and misrepresented by Basil. She reported it was not her intent to promote Dominion's plan for the compressor station in the community. She said that Basil announced in the meeting that she had called the meeting, but it was in truth Basil Gooden as a representative of Dominion that wanted it. She had taken it in good faith that it would address the real concerns of the community, but it was once again one directional and only promoting and gathering support for the Dominion agenda of locating the compressor station in the Union Hill neighborhood.

Two other meetings took place in the Union Hill neighborhood. I was not invited to either one of them but heard from a resident when they were taking place so attended. Once again the Dominion agenda was set and there was no meaningful engagement with residents concerns. One of these meetings included the attendance of a consultation specialist for the Department of Justice to investigate charges of reported by the press including racial discrimination. By this time residents, most of whom had not been attending meetings for four plus years were beginning to drink Dominion's kool aid, were inticed by promises of improvements to the community and the community was beginning to fracture.

Subsequent meetings were by invitation only and many people who live in the community, such as my husband and myself were not invited. The most severly impacted residents of Union Hill were eliminated and especially those who did not go along with the Dominion agenda. The primary group that had been meeting in numerous open public meetings for four plus years in the community at Union Hill Baptist Church were not invited. Most took place outside of Union Hill and this is where the Community Development Corporation (CDC)was formed by members who did not actively live in the community and would not bear the impacts of the location of the compressor station. (see Irene Leech comments on 1/4/19). It was reported in the CER that "residents expressed their displeasure with the protesting and lack of focus on community improvement". There was not any protesting by anyone who attended the meeting. I in fact was shouted down when I tried to go along with the agenda and offer a suggestion for something I felt the community might benefit from if the compressor station was permitted and in operation (air monitors and air cleaners for residences). This was ignored. Many people who raised their hands to speak were not recognized. The proposed economic developments would not benefit the losses and harms done to the most severly impacted residents. People near compressor stations are not compensated though they bear the most in terms of safety, health impacts and economic loss due to proximity to these infrastructures. We have not had any meaningful input into what it would provide or who would organize, manage the finances or assurance that our needs would be met by this largely outside the community CDC. We have been completely left out as we were seemingly deemed to be too threatening based on our considerable knowledge of and active participation in the regulatory process for these four plus years (see Irene Leech comments on CDC 1/4/19).

These community engagements were not meaningful involvement with the most severly impacted of the community. This is manufactered community engagement by Dominion to push their agenda to reach their goal of a permitted compressor station.

Lack of response to community concerns by DEQ

During October and November of 2015 I organized with other community members a door to door survey to gather information on concerns that people might have on the proposed location of the compressor station. Many people expressed concerns for the emissions and impacts on health and other concerns. These letters, 71 in all, were then sent to the DEQ asking for a public hearing to address these concerns.(see earlier copies of letters sent to DEQ by USPS on 1/3/19). Not one of these letters was ever answered or acknowledged in any way by any representative of the DEQ. In effect we had engaged the community for them and done their work and yet none of this was adressed. I sent several emails to the DEQ in hopes that I might be able to have some acknowledgement of them. These emails were never answered. Finally in the winter of of 2018(January 23 and February 26) two more emails were sent which i did not receive an answer to. I finally resorted to a FOIA request which i never received an an answer to. Later due to an intervention by a member of the Advisory Council who also sent in a FOIA i was able to view documents including the 71 letters that were sent in

2015. It was shortly after this that a visit was arranged with Mike Dowd of the DEQ Air Division to viist the community of Union Hill to see first hand and hear the concerns of the residents. This came about through an indirect intervention of Mary Finly Brook who redirected Mike Dowd to us who accepted our invitation to visit and her from the residents. Later the same day an informational meeting was held at the Buckingham Administration Building. Many concerns were raised by those who attended, particularly those in the impacted community. We were often referred to web pages and online materials(bear in mind we do not have reliable or little internet service here in Union Hill and many of the residents do not even own computers). The information was not helpful and highly technical. We were discouraged from raising concerns about our cultural resources, health and safety concerns, property values or the siting of the compressor station. Mike Dowd and Patrick Corbett recommended a very narrow menu of technical aspects that most of us were not educated or prepared enough to adequately address. Our concerns were irrrelevant, discouraged from commenting on in our public comments and dismissed. Dominion had been given many months to prepare an application with assistance form the DEQ. We the most impacted residents who would bear the greatest harm and risk were granted very little time in a comment period that lasted a mere few weeks.

Comments on Dr Fjord's Community Participatory Study as a team leader

I participated as a community member team leader in the community participatory demographic study conducted by Dr Lakshmi Fjord. These are my following experiences and conclusions as to why this is the best methodology for collecting community based data. I myself do community in home work through my work as a mental health worker in Buckingham and the surrounding counities so I am familiar with going into people's homes and interacting with them there:

When attempting to engage with community members within a close knit community, it was my experience that it always far more successful if the person(s) meeting with the household members are known to them or at least from the same community being faced with similar concerns. This increases the level of trust and the willingness for participants to provide information and express freely their concerns, if any. The relationship is developed based on mutual trust and concerns and there is a willingness for more information to be shared then with a stranger. A level of safety is established. Much emerges through this relationship that an unknown census taker might not be able to extract. My experience in going door to door was enriching for me as I got to know my neighbors in a much more personal and subsequently meaningful way. I think and know that there was a mutual benefit experienced at both ends of the relationship. As the relationship continues to develop more emerges and information becomes even more meaningful and enriching. I went back several times over to many of the homes I visited during my participation as a team leader in Dr Fjord's study. (see Dr Fjord's demographic study 1/4/19)

In conclusion I ask that you allow Dr. Fjord to rebutt the demographics that were introduced as the methodology used by DEQ being the ESRI maps and EJSCREEN. I feel that her methodology fills in gaps that these former methods do not accurately pick up.

Once again I thank you very much for your service on the Air Board and considering these comments.

Sincerely, Chad Oba Chair - Friends of Buckingham Impacted resident



Deny the Buckingham Compressor Station Permit, Registration No. 21599

Charlotte Shnaider (charsing@comcast.net) Sent You a Personal Message <automail@knowwho.com> To: airdivision1@deq.virginia.gov

Fri, Jan 4, 2019 at 9:01 AM

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gas-fired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Charlotte Shnaider 30 Oak Ln Staunton, VA 24401 charsing@comcast.net (540) 886-0517

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.



Deny the Buckingham Compressor Station Permit, Registration No. 21599

1 message

Kim Hughes (chihuahuacrazy@comcast.net) Sent You a Personal Message <automail@knowwho.com>

Fri, Jan 4, 2019 at 2:00

To: airdivision1@deq.virginia.gov

Dear Virginia Air Pollution Control Board,

I write to request that you deny the draft New Source Review air pollution permit for applicant Dominion Energy's proposed Buckingham Compressor Station for the Atlantic Coast Pipeline.

In analysis of the permit, DEQ stated the proposed site for the compressor station is "sparsely populated." Research done by community groups indicates this is not true, with over 200 Virginians living within a mile of the site. In response to expert testimony regarding Union Hill's status as an environmental justice community, DEQ dismissed concerns, using a source with less than reliable methodology to inaccurately conclude Union Hill is not an environmental justice community. Responding to a community study designed using protocol set by the National Institutes of Health showing a high prevalence of elderly, low-income and African American residents in Union Hill, DEQ continued to rely on census data that aggregated too large of an area, hiding the true density of the area. Without further analysis or discussion, DEQ cannot determine Union Hill is not an environmental justice community.

Furthermore, the health assessment is inadequate. DEQ has proposed a retrospective study to determine if there have been unhealthy levels of emissions, two years after the compressor station is in operation. This is unacceptable, equivalent to asking a person to smoke for two years and then assessing whether they were harmed. While indicating at the Board's 12/19 meeting intent to ask the Department of Health to conduct a study, DEQ has made no written assurances that the assessment will be conducted at all. Before the permit is granted, a comprehensive health assessment must be done.

Before and during the Air Board's meeting in November 2018, independent expert testimony pointed to a lack of need for the ACP, and therefore the compressor station, and the Board expressed concern over the necessity of the project. In response, DEQ repeated a quote from FERC's FEIS which stated that not allowing the ACP to be built "could" lead to issues meeting demand for natural gas. DEQ fails to address mounting evidence that more gas is not truly needed: declining gas prices; stagnant demand forecasts over the next decade; Dominion's abandonment of plans for new gasfired power plants in service areas. DEQ and Dominion have failed to consider these facts and have not shown a need for the ACP or the compressor station. Further, FERC has not yet authorized work to begin in Virginia on the ACP, and the project's future is even more questionable due to its permits being vacated by the courts. Without the necessary authorization to build the ACP, there is no need for the compressor station.

In responding to major concerns about the project causing greenhouse gas emissions and contributing to climate change, DEQ simply stated natural gas is more efficient compared to coal and oil. Their response ignores that methane and carbon dioxide emissions from the compressor station alone would cancel out one third of Virginia's proposed carbon reduction regulations aimed at mitigating climate change. The ACP served by the compressor station would even further exacerbate expected greenhouse gas emissions and commit the state to another generation of fossil fuel dependence. This is inconsistent with Virginia's sustainability goals.

The siting of the compressor station in the Union Hill community reflects an undeniable pattern of siting dangerous, polluting industrial facilities in poor communities of color across our nation; a pattern Virginia must break. Allowing this permit to stand would continue this pattern of environmental injustice.

The Board has the power to reject projects that would threaten human health and the environment. The draft air permit remains woefully inadequate to protect health, and I respectfully request that the Board deny it.

Sincerely,

Kim Hughes 5181 Chelsea Brook Lane Glen Allen, VA 23060 chihuahuacrazy@comcast.net (805) 762-4454

This message was sent by KnowWho, as a service provider only, on behalf of the individual noted in the sender information.



Comments concerning the Buckingham Compressor Station proposal from Cynthia Munley

1 message

Cynthia Munley <cmunley@live.com>

Fri, Jan 4, 2019 at 5:11 PM

To: "airdivision1@deq.virginia.gov" <airdivision1@deq.virginia.gov>

I, Cynthia Munley, am commenting on the ACP request for a compressor station in Buckingham County. I met an African American pastor of a Black church located in Union Hill at a Clean Air and Water rally in Pittsburgh, PA. I recorded and transcribed his comments and added the link to his statement below my comments. He says that his African American community is "being wiped off the map with no viable way forward." No amount of bribing with community centers should buy off a community from having access to clean air—especially for an unneeded boondoggle project. Dominion has cancelled its gas-powered plants and still wants the ACP to be built simply so it can needlessly reap the "guaranteed 15%" profit for building gas infrastructure. This must not be allowed.

Union Hill is being made a sacrifice zone. The state has defined its perimeter as larger than the affected community so that it does not look like it is 50% African American. That is unjust and trickery. Our state should not engage in this behavior.

I, in Virginia's Blue Ridge, now also live in a sacrifice zone for Virginia's other pipeline, MVP, which, tragically, has gotten much further because state boards did not act to save our water quality. The watershed for our municipality's water source is entirely crossed by the MVP—a project that has no independent orders for its fracked gas. The situation is similar for the ACP, where there are no independent orders for the gas. This is relevant. Everyone knows that Dominion Power has such a grip on state elected leaders that they get what they want. Dominion wants an unneeded ACP, so state leaders have made it their project. The reason we have citizen board members is to put a check on this type of corruption. The ball is in your court to use the tools you have available to protect Union Hill and other communities and stop the ACP.

Allowing any permit for the unneeded ACP is unjust and criminal. The SWCB has not yet acted to stop this twin ACP and MVP boondoggle, but the situation is rapidly evolving and closing in on the corruption. Stopping the compressor station is essential and begins to fight back against the pipeline corruption currently infecting Virginia. We see what is happening. In the case of the ACP, there is still time to prevent the kind of compounded and deep environmental damage that has occurred in the Blue Ridge with the MVP. If the state has a way to stop it, members of boards that are the gateway decision makers for state projects are obligated to prevent such exploitation of Virginia simply for corporate profit with absolutely no public good—and only higher energy costs to pay for the construction.

Former Governor Terry McAuliffe established the Advisory Council on Environmental Justice to provide independent, consistent, action-oriented approach to incorporating environmental justice into decision-making. Instead of continuing this work as he promised, Governor Northam is threatening to dissolve this council after they recommended stopping both pipelines.

We are not a country who should allow "sacrifice zones" as is already happening in Appalachia due to irresponsible inaction of the SWCB for not stopping the MVP before 42-inch welded pipes cover hundreds miles of private property and farms. Citizens have been run through the ringer in participating with state boards but we are losing trust that DEQ or state boards even listen or care about our air and water. DEQ must be fundamentally reformed with new leaders that take a protective defense of Virginians' environment. We also question if the state board members understand that they are the ones with the overarching power to call the shots at DEQ and stop calamitous projects.

Please listen to Reverend Paul Wilson's comments below and recognize the advice of the governor's Advisory Council on Environmental Justice, and vote against any compressor station for the ACP.

Reverend Paul M. Wilson on ACP: "our community is being wiped off the map" https://www.youtube.com/edit?o=U&video_id=k9pO-_9Tyog

Transcription:

9:27 Reverend Paul M Wilson on ACP: "our historic African-American community is being wiped off the map with NO viable future." Pastor Paul Wilson of Union Hill of Union Grove Baptist Church, in Buckingham County, Virginia, where the 600-mile pipeline--Atlantic Coast Pipeline (ACP)—will traverse Virginia and intersect with the Transco Pipeline. Here is a general paraphrase of Pastor Wilson's 9:27 minute talk very worth listening to in order to know firsthand the real effects on African American communities and everyone where these pipelines pass. The ACP crosses our community but my discussion today is about Environmental Injustice. The only compressor station on the ACP pipeline is slated for our community: 25-30 miles northeast of Appomattox, where the American Civil War ended and we are about the last days of the civil war. This is about environmental injustice relating to the ACP and MVP pipelines. This is about the truth concerning the destruction caused by these major infrastructure projects. This is a changing world and we know a lot more today about their effects. These infrastructure projects require remediation afterward due to the damage they cause.

Follow the money, corporatism and greed. People have personal agendas, the need for personal wealth and elitism which is permeating all of our government. People are being used, being bought off. I have maintained that it is the local churches who can stop these pipelines. Whether we are small or large, we are all one. Our historic community is one where all type of injustices are happening and our community is being destroyed to the point where we are being wiped off the map and where there is NO viable future for our community.

God gave man dominion over the earth. God did not give Dominion Energy dominion over Man. We have a responsibility to the Earth. Our responsibility is to protect the air we breathe and the water we drink. No corporation has the right to endanger the quality of air and water. In the rural areas, people depend on wells, which are damaged by these large infrastructure projects. It behooves us to speak up and stand up. History shows that we have the information out there about the great harm that these pipelines do to our water. Corporation greed and even government have the mechanisms to promote the propaganda to try to control minds and try to influence people to think like they think. But people like you and me: we should not be considered sacrificial zones.

The bottom line is that people like you and I have to live. My life is just as important as those in metropolitan America. It is time for Corporate America to rethink what they are doing to the environment. Climate change is real. We know what is real and so we face reality. It is not about the money, but it is about our health, it's about our childrens' and grandchildrens' future and the future of our planet.

There are all types of injustice: social, economic, community and environmental. But we need to stand up and speak truth and that is my role as a man of faith and a man of God—to speak truth and to keep my hands clean so that I can stand up and tell it just like it is and to speak truth. America needs to hear from those who are really affected by these types of projects. These types of projects ruin communities—and people of those communities—they lose monetary value of their homes and land—land that has been in those families for generations. American needs to rethink its energy needs and look more to renewables which are the thing now. Fossil fuels are in their death throws. Money should not be the driving factor. I speak truth.

These things are driven by money. Politicians are bought off. We need to look at the way our politicians are elected in this country and the financing about all that. We need to see the bigger picture. Leaders need to stand up. It is more than what happens in your back yard. This thing is all inter-related. We need to see the big picture, which is not focused on the dollar but on humankind and what our responsibilities are to Moth



Public Comment for Buckingham Dominion Air Compressor Station

1 message

Freeda Cathcart <contactfreeda@gmail.com> To: airdivision1@deq.virginia.gov

Sat, Jan 5, 2019 at 12:56 AM

RE: Summary of Cultural Resource Findings and Recommendations for the Buckingham Compressor Station, April 11, 2017 - Atlantic Coast Pipeline, LLC and Dominion Transmission, Inc. Response to Data Request and November 28, 2018 - ACP Buckingham Compressor Station Environmental Justice Review

Public Comment Submitted by: Freeda Cathcart, FLMI Dominion Shareholder, former member on the Virginia Board of Pharmacy and the Virginia Midwifery Advisory Board 2516 Sweetbrier Ave SW, Roanoke, VA 24015 540-598-7231

To the Members of the Air Pollution Control Board:

I'm very concerned about misleading information being submitted to the APCB by the DEQ staff and Dominion Energy. There is compelling evidence of environmental racism. The ACP Buckingham Compressor Station Environmental Justice Review, dated November 28, 2018, uses invalid census data to characterize the affected population and dependence on that analysis would be arbitrary and capricious.

It's up to the APCB if they want to allow public comments at the January 8 meeting. There are new developments being revealed on this subject and there might be new revelations the boards needs to know between the end of the public comment period and the meeting.

If the new APCB members have been sworn in then they have a constitutional duty to the people of Virginia to participate in the board's deliberating and decisions unless they have a personal conflict that would necessitate recusing themselves. It is not up to the governor or staff to determine how a board member fulfills their constitutional duty. The people rely on citizen boards to protect the people's interests from political or corrupt influences.

I attended the APCB hearing in Buckingham County. It was obvious Dominion had hired people to demonstrate outside the hearing to support the ACP. Inside during the hearing an African American man said he represented an African-American organization that supported the ACP. I hadn't heard of the organization and tried unsuccessfully to find it on the internet. I approached him after he spoke to see if he had a card or information about his organization since I couldn't find it online. It was suspicious when instead of offering me a card or talking to me, he hurriedly walked away.

Recently I read an article about an email exchange between the Virginia Department of Health and Director David Paylor:

"In a just released email that was sent to Paylor on December 6, Dr. Caroline Holsinger, Director of the Virginia Department of Health's Division of Environmental Epidemiology, said that she had conferred with the State Toxicologist and that he "did indicate that we could do a health assessment on projected data."...

Dr. Holsinger said "we would be happy to reach out to the best points of contacts to further discuss potential data" and she copied the state's Deputy Commissioner for Population Health and State Epidemiologist and the Deputy Commissioner for Governmental and Regulatory Affairs "for their awareness."

Almost one month later, it appears that David Paylor did nothing to let Dr. Holsinger know who the "best points of contacts" might be so that the health department could initiate its study.

David Paylor disclosed none of this to the Air Board. He did not reveal that the health department could

commence a health assessment now, based on demographic information and projected emissions data. He did not stress that the top officials of the health department had been advised of this situation and that the department was "happy to reach out to the best points of contacts" now - not at some undefined time in the future, to start collecting data.

Paylor did not tell the Air Board on December 19 that thirteen days earlier, on December 6, the health department had offered to commence a health assessment now. And that he had done nothing to help them get started...

Will the Air Board... delay a vote on the compressor station permit until the health assessment study is done. That is exactly what was demanded by the state NAACP and the Governors' Advisory Council on Environmental Justice. And the Department of Health is now happy to commence it."

This past Wednesday, January 2, I attended an event after Rebecca Kellam, former member of the Virginia Water Control Board, toured part of the Mountain Valley Pipeline. She said she didn't trust the DEQ to protect our water quality.

This past summer South Carolina Small Business Chamber president, Frank Knapp, warned that South Carolina won't fund unneeded capital projects like Virginia's pipelines. Energy industry expert, Thomas Hadwin concurred "Decades of burdening Virginia with expensive, unnecessary pipelines will depress Virginia's economy, competitiveness and job-creation with no benefits." He summed up: "Why sacrifice your mountains, environment and water... just to pay more?"

Delegate David Toscano, former Minority Leader of the House, wrote "The proposed siting of the gas compression station at Union Hill is increasingly problematic. And my initial concern about the cost of the pipeline, much of which will be borne by the ratepayers, has only intensified... But those choices do not mean we need to embrace a pipeline as massive as the Atlantic Coast Pipeline. This behemoth is "leaking oil" and, like that old car, is no longer worth the investment needed to keep it going."

I delivered a letter on December 5, 2018 to Dominion Energy's Board of Directors with the following request: "Dominion Energy has a responsibility to their shareholders to not proceed with incurring more construction costs for the ACP until they can establish an economic need for the project, all the necessary permits are in place and all the legal challenges have been resolved."

In December 2018, Virginia's utility regulator asked Dominion Energy to redo its integrated resource plan for the 2019 to 2033 period. Our State's Corporation Commission said that the plan submitted in May by Dominion "failed to establish that its 2018 IRP, as currently filed, is reasonable and in the public interest." This is the first time the SCC has rejected a utility's plan.

The State Corporation Commission (SCC) outlined several points of criticism, arguing that **Dominion's model** overestimated load, which it projected to be higher than PJM Interconnection's estimates.

Since Dominion Energy has failed to do due diligence to determine a compelling economic need to build the ACP which would pollute the air in our Commonwealth and there are currently legal challenges being addressed by the courts as well as ACP losing crucial permits (Nationwide 12 permit to cross water bodies, the permit to cross the forest and the Blue Ridge Parkway), it would be premature for the Air Pollution Control Board to confer a permit to Dominion Energy for the ACP Air Compressor Station in Buckingham.

Thank you for your service and consideration, Freeda Cathcart

540-598-7231